NRC Review of NEI 04-01, Revision D: Draft Industry Guideline for Combined License Applicants Under 10 CFR Part 52



NRC/NEI Public Meeting April 7, 2005

1

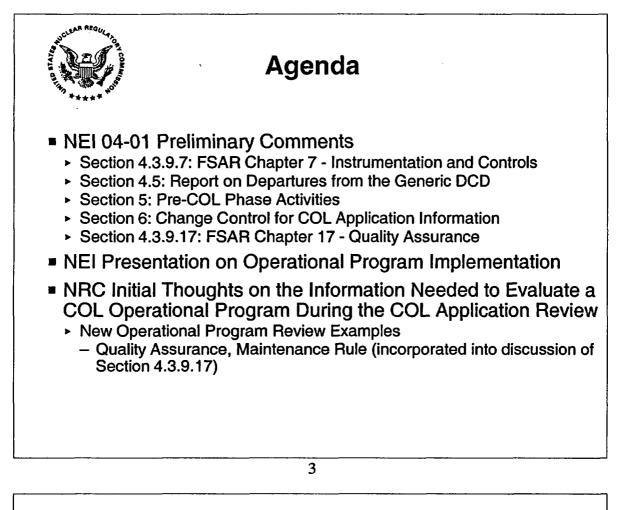


NEI 04-01

- NRC providing preliminary comments during public meetings
- Behind NEI's "strawman" schedule of February 2005
- NRC plans to provide 1st round comments in June
- Competing priorities will delay the discussion of certain issues
- Some sections of NEI 04-01 may not need to be discussed at this time

COL OPR

- Four of fourteen operational programs identified in May 14, 2001, NEI letter remain to be discussed after today's meeting
- Consistent themes developing in the completion of NRC's work:
 - Availability of operational program document before fuel load
 - Implementation schedule of operational program





Section 4.3.9.7: FSAR Chapter 7 - Instrumentation and Controls

- Guidance for COL Applicants on Design Implementation of Digital Instrumentation and Control Systems in Nuclear Power Plants
 - See separate handout
 - Draft comments to support this meeting sent to NEI by letter dated March 16, 2005 (Accession # ML050750083)
 - Includes draft of NUREG-0800, Chapter 7 (Revision 4 issued June 1997)



Section 4.5: Report on Departures from the Generic DCD

- This section acceptable, but cannot comment on proposed rule for Part 52
- Be aware that the timing of reports in AP1000 proposed rule has been changed.

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Preliminary Comments and Questions

5

Section 5: Pre-COL Phase Activities

No preliminary comments in following sections:

- Applicant Programs Required in the Pre-COL Phase (Section 5.1)
- Engineering Design Verification (Section 5.2)
- Pre-COL ITAAC Related Activities (Section 5.3)
 - Coordination of ITAAC-Related Activities with NRC (Section 5.3.1)
 - Completion of ITAAC Prior to Issuance (Section 5.3.2)
- Required Records and Reporting to NRC (Section 5.4)
 - Record keeping (Section 5.4.1)

Discussed in conjunction with quality assurance

Design Reliability Assurance Program (Section 5.1.3)

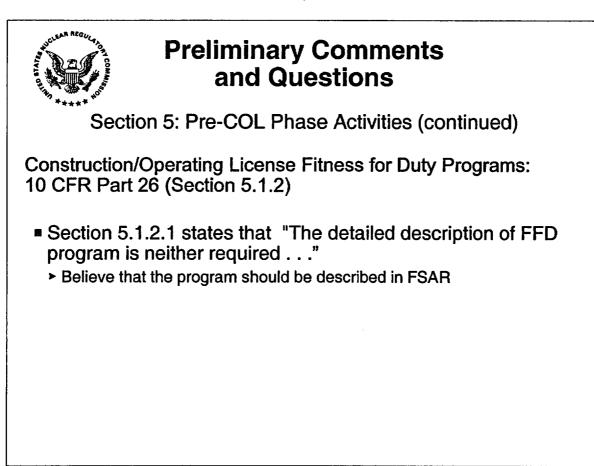


Section 5: Pre-COL Phase Activities (continued)

Design/Construction Quality Assurance Program and Part 21 Program (Section 5.1.1)

- Section 5.1.1 states that "In addition to certain design activities, seismic investigations at the site would be included in pre-application work . . . subject to QA requirements."
 - Believe that other site investigation activities could be subject to QA in addition to seismic investigations

7





Section 5: Pre-COL Phase Activities (continued)

Required Records and Reporting to NRC (Section 5.4) Reports and Updates to NRC (Section 5.4.2)

- Section 5.4.2 states that "These reports are required annually . . . "
 - ► this requirement has been changed in the proposed rule for AP1000



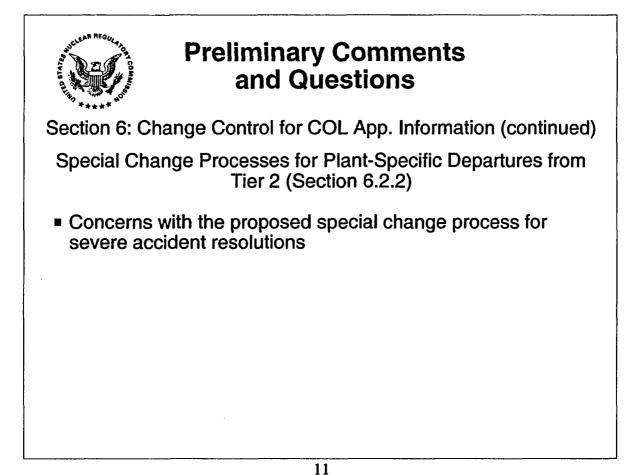


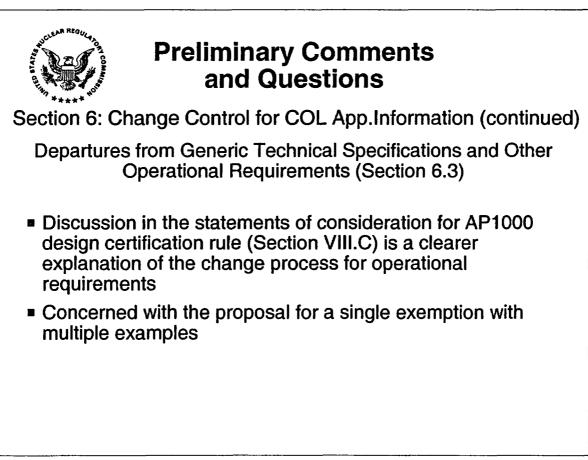
Preliminary Comments and Questions

Section 6: Change Control for COL Application Information

No preliminary comments in following sections:

- Plant-Specific Exemptions from Tier 1 Information (Section 6.1)
- Plant-Specific Departures from Tier 2 Information (Section 6.2)
 - Plant-Specific Exemptions from Tier 2 Information (Section 6.2.1)
- Post Application Change Process (Section 6.5)





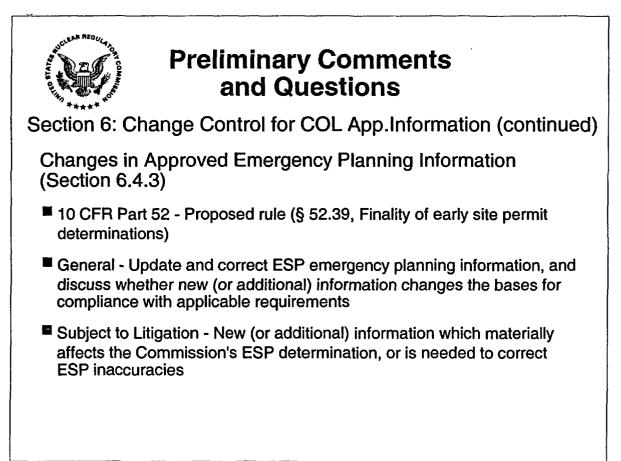


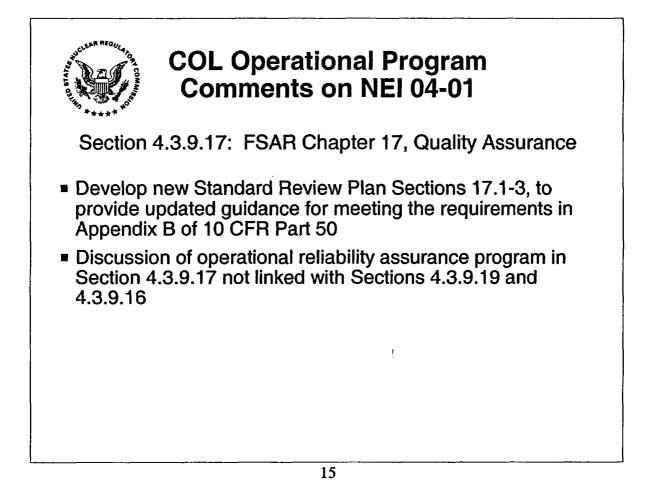
Section 6: Change Control for COL App.Information (continued) Changes in Approved Early Site Permit Information (Section 6.4)

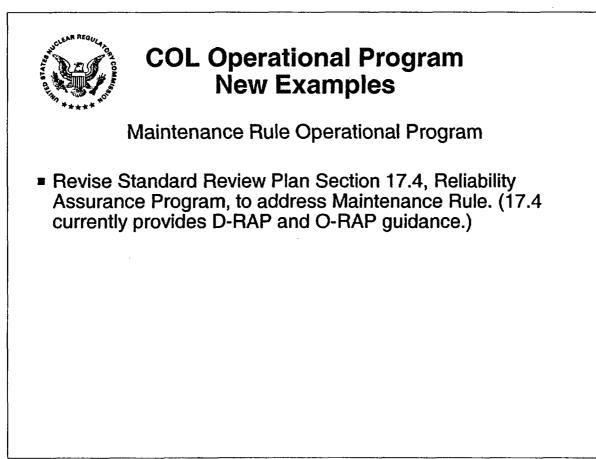
Discussion Topics

- GENERAL
- RESOLVED ISSUES
- MAJOR FEDERAL ACTION
- CHANGES AND NEW INFORMATION
- COL EIS
- ENVIRONMENTAL REVIEW STANDARD
- ESP-COL INTERFACE
- CONCLUSIONS IN THE ESP EIS
- EXAMPLES AND OTHER ENVIRONMENTAL STATUTES

13







Status of Operational Program Discussions in NRC/NEI Public Meetings		
Operational Program (05/14/01 NEI Letter)	Meeting Date	<u>Followup</u>
Emergency Planning	N/A	No
Quality Assurance	04/07/05	?
Radiation Protection	03/03/05 ¹	Yes
Fitness for Duty	03/03/05	Yes
Licensed Operator		
Containment Leak Rate Testing		
Inservice Inspection and Inservice Testing	02/02/05	No
Physical Security	03/03/05 ²	Yes
Fire Protection	02/02/05	No
Access Authorization	03/03/05	Yes
Training		
Reportability	03/03/05 ³	?
Maintenance Rule	04/07/05	?
Equipment Qualification		

Notes: 1) Separate public meetings underway with NEI on content of FSAR Chapter 12; 2) NEI to form separate task force on security design FTAAC; 3) NEI provided view of reportability operational program but NRC has not presented its view.

